

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF LOUISIANA
NEW ORLEANS DIVISION

DR. CARLOS BRINGUIER

VS.

GAMBI PUBLICATIONS, INC. : C.A. NO. 67-648
HAROLD WEISBERG :
AND :
DELL PUBLISHING CO., INC. : DIVISION "P"

MOTION TO QUASH SERVICE OF PROCESS
AND RETURNS OF SERVICE OF PROCESS AND
MOTION TO DISMISS THE ACTION FOR LACK
OF JURISDICTION

GAMBI PUBLICATIONS, INC., HAROLD WEISBERG and DELL PUBLISHING CO., INC., sought to be made Defendants herein, appearing specially for the purpose of these Motions and not otherwise, and each reserving their respective rights to file such further Motions or Pleas as they or either of them deem necessary and proper, move the Court to enter an Order:

(1) Quashing the service of process and returns of service of process on Movers herein, the attempted services having been made through the Office of the Secretary of State of the State of Louisiana; and

(2) Dismissing the action for want of jurisdiction on the grounds that Movers, GAMBI PUBLICATIONS, INC., and DELL PUBLISHING CO., INC., are foreign corporations not qualified to do and not doing business in Louisiana and not having the "minimum contacts" with the State of Louisiana necessary to confer jurisdiction on this Honorable Court and on the ground that Mover, HAROLD

and the 1st Amendment to the United States Constitution as interpreted by the jurisprudence.

DUFOUR, LEVY, MARX & LUCAS

WILLIAM M. LUCAS, JR.

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Attorneys for GAMBI PUBLICATIONS, INC.,
HAROLD WEISBERG and DELL PUBLISHING CO.,
INC., Defendants.

C E R T I F I C A T E

I hereby certify that a copy of the above and foregoing Motions and Memorandum of Authorities in Support of Motion of Quash Service of Process and Returns of Service of Process and Motion to Dismiss the Action for Lack of Jurisdiction, as well as Notice of Hearing on said Motions has been served on Complainant, DR. CARLOS BRINGUIER, by delivering same by hand to his Counsel of Record, HERBERT C. PARKER, III, ESQ., 822 Gravier Building, 535 Gravier Street, New Orleans, Louisiana, 70130, on this day of June, 1967.

WILLIAM M. LUCAS, JR.